

Presentment Date and Time:
November 3, 2023
at 12:00 noon

David M. Fournier (admitted *pro hac vice*)
Marcy J. McLaughlin Smith (admitted *pro hac vice*)
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Counsel for Valour Inc.

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

Genesis Global Holdco, LLC, et al.,¹

Debtors.

Chapter 11

Case No. 23-10063 (SHL)

**MOTION OF MARCY J. MCLAUGHLIN SMITH TO WITHDRAW AS COUNSEL FOR
VALOUR, INC. AND OPPORTUNITY FOR HEARING**

Pursuant to Local Federal Rule of Bankruptcy Procedure 2090-1(e), Marcy J. McLaughlin Smith of Troutman Pepper Hamilton Sanders LLP respectfully moves to withdraw as counsel for Valour, Inc. (“Valour”) in the above-captioned case (the “Motion”).

In support of her Motion, Marcy J. McLaughlin Smith states as follows:

1. After October 27, 2023, Marcy J. McLaughlin Smith will no longer be employed by Troutman Pepper Hamilton Sanders LLP and will no longer represent Valour.

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s tax identification number (as applicable), are: Genesis Global Holdco, LLC (8219); Genesis Global Capital, LLC (8564); Genesis Asia Pacific Pte. Ltd. (2164R). For the purpose of these Chapter 11 Cases, the service address for the Debtors is 250 Park Avenue South, 5th Floor, New York, NY 10003.

2. David M. Fournier of Troutman Pepper Hamilton Sanders LLP will continue to represent Valour in this case.

For the foregoing reasons, Marcy J. McLaughlin Smith respectfully requests that this Court enter an order granting her Motion to withdraw as counsel for Valour in the above-captioned case.

Dated: October 27, 2023
Wilmington, Delaware

/s/ Marcy J. McLaughlin Smith
David M. Fournier (admitted *pro hac vice*)
Marcy J. McLaughlin Smith (admitted *pro hac vice*)
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Counsel for Valour, Inc.

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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

Genesis Global Holdco, LLC, et al.,¹

Debtors.

Chapter 11

Case No. 23-10063 (SHL)

**NOTICE OF PRESENTMENT OF ORDER GRANTING MOTION OF
MARCY J. MCLAUGHLIN SMITH TO WITHDRAW AS COUNSEL FOR
VALOUR, INC. AND OPPORTUNITY FOR HEARING**

PLEASE TAKE NOTICE that upon the annexed Motion of Marcy J. McLaughlin Smith to withdraw as counsel for Valour, Inc. in the above-captioned proceeding, the undersigned will present the attached proposed order to the Honorable Judge Sean H. Lane, United States Bankruptcy Judge, United States Bankruptcy Court for the Southern District of New York, for signature on November 3, 2023 at 12:00 noon.

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's tax identification number (as applicable), are: Genesis Global Holdco, LLC (8219); Genesis Global Capital, LLC (8564); Genesis Asia Pacific Pte. Ltd. (2164R). For the purpose of these Chapter 11 Cases, the service address for the Debtors is 250 Park Avenue South, 5th Floor, New York, NY 10003.

PLEASE TAKE FURTHER NOTICE that unless a written objection to the proposed order, with proof of service, is filed with the Clerk of the Court and a courtesy copy is delivered to the Bankruptcy Judge's chambers at least three days before the date of presentment, there will not be a hearing and the order may be signed.

PLEASE TAKE FURTHER NOTICE that if a written objection is timely filed, the Court will notify the moving and objecting parties of the date and time of the hearing and of the moving party's obligation to notify all other parties entitled to receive notice. The moving and objecting parties are required to attend the hearing, and failure to attend in person or by counsel may result in relief being granted or denied upon default.

PLEASE TAKE FURTHER NOTICE that the ECF docket number to which the filing relates shall be included in the upper right hand corner of the caption of all objections.

Dated: October 27, 2023
Wilmington, Delaware

/s/ Marcy J. McLaughlin Smith
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Marcy J. McLaughlin Smith (admitted *pro hac vice*)
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Counsel for Valour, Inc.

To: Valour, Inc.
c/o Peter Maerkl
peter@valour.com

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

Genesis Global Holdco, LLC, et al.,¹

Debtors.

Chapter 11

Case No. 23-10063 (SHL)

**ORDER GRANTING MOTION OF MARCY J. MCLAUGHLIN SMITH TO
WITHDRAW AS COUNSEL FOR VALOUR, INC.
AND OPPORTUNITY FOR HEARING**

Upon the Motion of Marcy J. McLaughlin Smith seeking the entry of an order to withdraw as attorneys of record for Valour, Inc. in the above-captioned case (the “Motion”); and the Court having fully considered all other papers filed in connection with the Motion; and having determined that good and sufficient cause exists for granting the Motion, it is hereby:

ORDERED, that Marcy J. McLaughlin Smith is granted leave to withdraw as counsel for Valour, Inc. and is hereby deemed removed as counsel for Valour, Inc. in the above-captioned case.

Dated: _____, 2023

Honorable Sean H. Lane
United States Bankruptcy Judge

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CERTIFICATE OF SERVICE

I certify that on October 27, 2023, I caused a copy of the foregoing document to be served (i) via CM/ECF electronic notice on all parties who receive such notice, (ii) upon the parties listed on the attached service list in the manner indicated; and (iii) on Valour, Inc. via email at:

Valour, Inc.
c/o Peter Maerkl
peter@valour.com

/s/ Marcy J. McLaughlin Smith
Marcy J. McLaughlin Smith

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